

Diana Costantino Gomprecht (DG-2181)  
Epstein Becker & Green, P.C.  
250 Park Avenue  
New York, New York 10177  
(212) 351-4500  
Attorneys for Defendant  
BLUE CROSS AND BLUE SHIELD OF MASSACHUSETTS, INC.

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x  
CHRISTOPHER B. TURCOTTE and SUSAN  
TURCOTTE,

Plaintiffs,

07 Civ. 4023 (KMK)(MHD)

- against -

**MOTION TO ADMIT  
COUNSEL PRO HAC  
VICE**

BLUE CROSS BLUE SHIELD OF  
MASSACHUSETTS, INC.,

Defendant.  
----- x

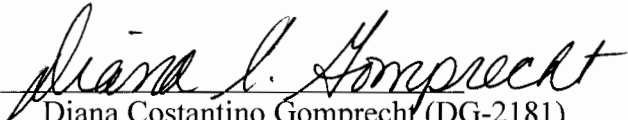
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District  
Courts for the Southern and Eastern Districts of New York, I, Diana Costantino Gomprecht, a  
member in good standing of the bar of this Court, hereby move for an Order allowing the  
admission pro hac vice of:

Joseph Halpern  
Deputy General Counsel  
Blue Cross and Blue Shield of Massachusetts, Inc.  
401 Park Drive  
Boston, Massachusetts 02215  
(617) 246-3528  
Fax: (617) 246-3550

JOSEPH HALPERN is a member in good standing of the Bar of the State of Massachusetts. There are no pending disciplinary proceedings against Joseph Halpern in any State or Federal court.

Dated: June 15, 2007  
New York, New York

EPSTEIN BECKER & GREEN, P.C.

By:   
Diana Costantino Gomprecht (DG-2181)  
250 Park Avenue  
New York, New York 10177-0077  
(212) 351-4500  
Fax: (212) 661-0989  
Attorneys for Defendant

To: Christopher B. Turcotte, Esq.  
320 East 57<sup>th</sup> Street, #14B  
New York, New York 10022

Diana Costantino Gomprecht (DG-2181)  
Epstein Becker & Green, P.C.  
250 Park Avenue  
New York, New York 10177  
(212) 351-4500  
Attorneys for Defendant  
BLUE CROSS AND BLUE SHIELD OF MASSACHUSETTS, INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
CHRISTOPHER B. TURCOTTE and SUSAN  
TURCOTTE,

Plaintiffs,

07 Civ. 4023 (KMK)(MHD)

- against -

BLUE CROSS BLUE SHIELD OF  
MASSACHUSETTS, INC.,

Defendant.

**AFFIDAVIT OF DIANA  
COSTANTINO  
GOMPRECHT IN  
SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

----- X

STATE OF NEW YORK     )  
                                  )     ss:  
COUNTY OF NEW YORK    )

DIANA COSTANTINO GOMPRECHT, being duly sworn, hereby deposes and  
says as follows:

1.     I am an attorney associated with the firm of Epstein Becker & Green, P.C.,  
counsel for the Defendant in the above captioned action. I am familiar with the proceedings in  
this case. I make this statement based on my personal knowledge of the facts set forth herein and  
in support of Defendant's motion to admit Joseph Halpern as counsel pro hac vice to represent  
Defendant in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in May 2002. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.

3. I have know Joseph Halpern for several weeks.

4. Mr. Halpern is Deputy General Counsel for Blue Cross and Blue Shield of Massachusetts, Inc. in Boston, Massachusetts.

5. I have found Mr. Halpern to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. According, I am pleased to move for the admission of Joseph Halpern, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Joseph Halpern, pro hac vice, which is attached hereto as Exhibit A.

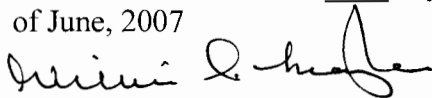
WHEREFORE, it is respectfully requested that the motion to admit Joseph Halpern, pro hac vice, to represent Defendant in the above captioned matter, be granted.

June 15, 2007  
New York, New York

Respectfully submitted,

  
Diana Costantino Gomprecht (DG-2181)

Sworn to before me this 15<sup>th</sup> day  
of June, 2007



Notary Public

**WILLIAM C. MAUGHAN**  
Notary Public, State of New York  
No. 01MA6082607  
Qualified in Kings County  
Commission Expires October 28, 2010

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- x

CHRISTOPHER B. TURCOTTE and SUSAN  
TURCOTTE,

Plaintiffs,

07 Civ. 4023 (KMK)(MHD)

- against -

**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

BLUE CROSS BLUE SHIELD OF  
MASSACHUSETTS, INC.,

Defendant.

----- x

Upon the motion of Diana Costantino Gomprecht, an attorney with the firm of Epstein Becker & Green, P.C., as attorneys for Blue Cross and Blue Shield of Massachusetts, Inc. (erroneously named in the caption as “Blue Cross Blue Shield of Massachusetts, Inc.”) and said sponsor attorney’s affidavit in support;

IT IS HEREBY ORDERED that

Joseph Halpern  
Deputy General Counsel  
Blue Cross and Blue Shield of Massachusetts, Inc.  
401 Park Drive  
Boston, Massachusetts 02215  
(617) 246-3528  
Fax: (617) 246-3550  
Email Address: [Joseph.Halpern@bcbsma.com](mailto:Joseph.Halpern@bcbsma.com)

is admitted to practice pro hac vice as counsel for Blue Cross and Blue Shield of Massachusetts, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the

Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:  
New York, New York

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United States District Judge

**AFFIDAVIT OF SERVICE BY MAIL**

STATE OF NEW YORK        )  
                                      )       ss.:  
COUNTY OF NEW YORK    )

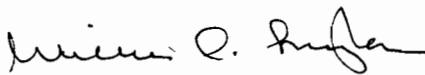
Diana Costantino Gomprecht, being duly sworn, says:

I am not a party to this action, am over 18 years old and reside in Westchester County. On June 15, 2007, I served a true copy of the attached Motion to Admit Counsel Pro Hac Vice by first class mail by depositing same in a sealed envelope, postage prepaid, in an official depository of the U.S. Postal Service within the State of New York, addressed to the following persons at the address indicated below:

Christopher B. Turcotte, Esq.  
320 East 57<sup>th</sup> Street, #14B  
New York, New York 10022

  
Diana Costantino Gomprecht

Sworn to before me this  
15th day of June, 2007



\_\_\_\_\_  
Notary Public

**WILLIAM C. MAUGHAN**  
**Notary Public, State of New York**  
**No. 01MA6082607**  
**Qualified in Kings County**  
**Commission Expires October 28, 2010**

## COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **seventeenth** day of **January** A.D. **1985**, said Court being the highest Court of Record in said Commonwealth:

**Joseph Halpern**

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court\*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **eightth** day of **June** in the year of our Lord **two thousand and seven**.



  
MAURA S. DOYLE, Clerk

\* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.